REMARKS

The above amendment is made in response to the Final Office Action of May 27, 2003. Claims 1-9, 14, 18-20, 24, 26 have been amended. Claims 1-26 are pending in the present application and stand rejected. The Examiner's reconsideration is respectfully requested in view of the above amendment and the following remarks.

The Final Office Action rejected claims 1-25 under 35 U.S.C. § 101 because the claimed invention is supposedly directly to non-statutory subject matter. More specifically, the Final Office Action alleged that "[c]laims 1-25 set forth non-functional descriptive material but fail to set forth physical structures or materials comprising of hardware or a combination of hardware and software within the technological arts (i.e. a computer) to produce 'useful, concrete and tangible' result." The rejection is respectfully traversed.

It is reiterated that hyperlinking is a well-known mechanism used to access information on local machines, an intranet, or the Internet. Automatically hyperlinking multimedia product documents, for example, is within the technological arts. The claims recite subject matter drawn to materials comprising hardware or a combination of hardware and software that is within the technological arts and that produces a useful, concrete and tangible result (*e.g.*, linking two document objects within a document or across two different documents). Withdrawal of the rejection of claims 1-26 under 35 U.S.C. § 101 is respectfully requested.

Claim 1 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Rodkin et al. (U.S. Patent No. 6,092,074) in view of Liu et al. (U.S. Patent No. 5,794,257). The rejection is respectfully traversed.

The Final Office Action admits that Rodkin and Liu do not disclose "a source identifier" and "a source anchor generator," as disclosed in amended claim 1. The Final Office Action alleges that Sotomayor (U.S. Patent No. 5,708,828) discloses "a source identifier" and "a source generator." In Sotomayor's method, the alleged "source identifier" and "source anchor generator" are applied in the process of analyzing the semantics of document content. Whereas, in the present invention, as claimed in claim 1, the "the source identifier and the source anchor generator support the incremental hyperlinking and the source-level dynamic hyperlinking." Sotomayor does not disclose the use of "a source identifier" and "a source generator" for supporting "incremental hyperlinking" and "dynamic hyperlinking."

It is maintained that the references of Rodkin, Liu, and Sotomayor are not properly combinable. Accordingly, withdrawal of the rejection of claim 1 under 35 U.S.C. § 103(a) is respectfully requested.

Claims 2-26 rejected under 35 U.S.C. § 103(a) as being unpatentable over Rodkin and Liu, further in view of Sotomayor, and further in view of Chang (U.S. Patent No. 5,694,594). The rejection is respectfully traversed.

With regard to claim 3, Rodkin, Liu, and Sotomayor do not disclose "a link browser" and "a document browser." Thus, the Final Office Action relies on Chang as disclosing "a link browser" and "a document browser." Amended claim

3 recites, *inter alia*, "a link browser...*for interpreting hyperlinks that have been fully or partially generated.*" Chang discloses the use of its alleged "link browser" for the *generation* of hyperlinks. The present invention, as claimed in claim 3, uses the link browser for interpreting links that have already been at least partially generated. Chang does not disclose the use of its alleged "link browser" for the interpretation of hyperlinks that have been fully or partially generated.

With regard to claims 4 and 5, Sotomayor, Liu, and Chang do not disclose "a destination identifier." Thus, the Final Office Action relies on Rodkin as disclosing "a definition identifier." In particular, the Final Office Action cites Rodkin's teaching of identifying a destination address as allegedly disclosing "a definition identifier." Rodkin's destination address has a different meaning than Rodkin's source object. Thus, in Rodkin, it is not possible to perform additional steps of linking once the destination address is reached. In the present invention, the source objects, intermediate objects, and destination objects are represented in the same way. Thus, the system can continue indefinitely until the final destination objects are reached (of beyond, if necessary).

With regard to amended independent claims 7, 9, 18, 20, and 26, it is noted that these claims also contain the limitation of wherein the source identifier and the source anchor generator support incremental hyperlinking and dynamic hyperlinking, as is claimed in amended claim 1.

With regard to claims 8, 14, 19, and 24, it is noted that these claims also contain the limitation of "a link browser...for interpreting hyperlinks that have been fully or partially generated," as is claimed in amended claim 3.

It is maintained that the references of Rodkin, Liu, Sotomayor, and Chang are not properly combinable. Because the cited references fail to disclose one or more features recited in independent claims 7, 9, 18, 20, and 26, these references would not have anticipated or rendered obvious the subject matter of claims 7, 9, 17, 20, and 26. Accordingly, withdrawal of the rejections to claims 7, 9, 18, 20, 26 is respectfully requested. Claims 2-6, 8, 10-17, 19, and 21-25, which depend from claims 1, 7, 9, 18, 20, and 26, are likewise patentable over the cited references for at least the reasons discussed above. Accordingly, withdrawal of the rejection of claims 2-26 under 35 U.S.C. § 103(a) is respectfully requested.

In view of the foregoing remarks, it is respectfully submitted that all the claims now pending in the application are in condition for allowance. Early and favorable reconsideration is respectfully requested.

Respectfully submitted,

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